

USA

vs

Martinez - Brooks

2:18-cr-00038-JCL

Motion for request of compassionate release.

Danbury Federal Prison has had an on going outbreak resulting in one fatality over 30 inmates sick and over 60 officers sick.

Attorney General Barr, in his April 3rd Memorandum to the Bureau of Prison has designated Danbury as one of the prison with concerns of being a "Hot Zone"

Attorney General Barr wrote "We have to move with dispatch in using home confinement, where appropriate, to move vulnerable inmates out of these institutions (see attached memorandum)

Despite memorandum and growing cases at Danbury to date the Camp has only had one prisoner who was pregnant released.

Danbury has not prioritized consideration for elderly and the most vulnerable as directed.

As verified in my PSI I have lupus and

chronic Asthma. In addition, since I have been incarcerated I have developed high blood pressure which are all underlying conditions, as per the CDC.

On three previous occasions ~~two~~ related to my to my asthma/chronic lung disease, I have had problems securing the necessary treatment and have had to reach to either my attorney or family for assistance. (see attached).

Danbury has ~~to~~ not followed safety measures suggested suggested by CDC such as keeping inmates and employees six feet apart in cells or communal areas to avoid the possibility of contracting the virus.

Furthermore, as per the attached the supposed quarantine / lock down is putting me at additional risk. I have a severe peanut allergy which is noted in my Prison health history. On March 6, 2020 Peanut butter & Jelly was served in our dorm style housing unit causing me to inhale peanut butter and have an allergic reaction.

Since March 6, 2020, I have had to leave my dorm at least six times with no warning to avoid having an allergic reaction to peanut butter which was served as a meal.

All meals are being served in our cubicles

in dorm style living. In A dorm where I reside there are currently 48 women.

In addition, 48 women are expected to utilize a bathroom which has three toilets and four showers which is beyond the required eight to one ratio in BOP policies.

Said bathroom is also not being properly cleaned adding to the risk of germ spread.

Given Danbury's inability to properly keep inmates safe, my previous and current medical conditions I am asking for a commute c/s sentence.

Wherefore, petitioner respectfully and humbly request Your Honor to allow petitioner immediate release.

The eminent threat of contracting the virus is real and based upon my underlying medical conditions I believe I qualify for release.